Draft RM 10.9 Removal Action Design Work Plan Report, Lower Passaic River Study Area Responses to EPA's Review Comments September 27, 2012



Comment No.	Commenter	Text Highlighted	Comment	Response
1	Stephanie Vaughn/USEPA	Global Comment	Overall, the RDWP closely follows the provisions of the AOC and the SOW. As this will be a final work plan, please incorporate the changes requested below and re-submit the document for approval.	Noted
2	Stephanie Vaughn/USEPA	Page 1-2, Section 1.2.2, Paragraph 2	The removal area is listed here as approximately 5.6 acres, whereas it is listed as 5 acres in the AOC. For clarity, please add a brief explanation or footnote of why the area increased.	The text has been revised to indicate why the area has increased from that listed in the AOC.
3	Stephanie Vaughn/USEPA	Page 1-2, Section 1.2.3	Please add a brief description of Passaic River hydrology and of the NJDEP designated use classification, and the associated designated uses, in the area of the removal.	The text has been revised accordingly.
4	Stephanie Vaughn/USEPA	Page 1-2, Section 1.2.3	Please remove the first sentence of the last paragraph of this section ("The surface sediment of the RM 10.9 Removal Area is believed to be").	The sentence has been removed.
5	Stephanie Vaughn/USEPA	Page 1-3, First Sentence	The AOC does not require removal of debris and sediment via water, nor does it require the use of mechanical dredging. Please clarify that the CPG proposes using on-river transport, doing the work on-water, and using mechanical dredging, and that the rationale for taking this approach will be expanded upon in the design. In other words, the option of doing the work on-land can't be dismissed without any consideration of the option. EPA is not suggesting that it disagrees with the CPG's approach.	As the Township of Lyndhurst has indicated in a letter to the USEPA dated July 6, 2012 that the Riverside Park property "not be used for the staging, processing and disposal of the removed sediment" it was determined that conducting the removal effort from the water would eliminate a possible 3 rd party constraint which could delay the project. Text has also been revised to replace the phrase "removal will require" with the phrase "CPG proposes removing the" based on technical reasons.
6	Stephanie Vaughn/USEPA	Page 1-3, 3 rd Paragraph	Please delete the first few words of this paragraph, and begin with "To investigate alternate dispositions"	The text has been revised accordingly.
7	Stephanie Vaughn/USEPA	Page 1-3, 5 th Paragraph	Please re-write the first two sentences of this paragraph as follows: Following completion of the sediment removal, a protective cap will be constructed, monitored and maintained over the Removal Area. Data gathered during the monitoring of the performance of this cap will be evaluated and taken into consideration in the LPRSA RI/FS and may help inform the remedy selection process for future response actions.	The text has been revised accordingly.
8	Stephanie Vaughn/USEPA	Page 1-4, Section 1.5, Bullet 2	Add the word "approximately" before each instance of the 18,000 CY figure. Add language at the end of this bullet indicating that the ex situ volume to be treated depends upon what the treatment vendor(s) can address.	The text has been revised accordingly.
9	Stephanie Vaughn/USEPA	Page 2-1, Section 2.1	In the last sentence of the first paragraph, "addition" should be "additional."	The text has been revised accordingly.
10	Stephanie Vaughn/USEPA	Page 3-2, Section 3.1.1.3	Neither this section, nor Section 3.1.2.2, mention dewatering of the sediment once it is off-loaded from the barge. If pilot studies are not	Dewatering is not required prior to stabilization of the sediment nor is it being considered as stabilizationis a more cost effective

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			conducted, will dewatering be required prior to stabilization? If so, this step needs to be incorporated into the design.	alternative for the project. However, as dewatering is still a potential treatment option, the text has been revised accordingly.
11	Stephanie Vaughn/USEPA	Page 3-6, Section 3.1.3	The text notes that the final design will include all comments that are "mutually resolved" between EPA and the CPG. As is stated in the SOW, the final design shall "fully incorporate EPA comments." Please revise.	The text has been revised to state that comments shall be fully incorporated in the Final Design following discussions with the USEPA.
12	Stephanie Vaughn/USEPA	Page 5-1, Table 5-1, Design Approach	Three of the five design packages considered are designated as "performance" and two are designated as "prescriptive." Please expand on these designations and their implications with respect to the subsequent design phases and integration with contractor procurement and the overall implementation/construction schedule.	The text has been revised to include a discussion on "performance" and "prescriptive" designs.

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